

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, JOHN )  
MEINERS, and DANIEL UMPA, )  
individually and on behalf of all others )  
similarly situated, )

Plaintiffs, )

v. )

NATIONAL ASSOCIATION OF )  
REALTORS, ET AL., )

Defendants. )  
)  
)  
)

Case No. 4:23-CV-00788

[Consolidated with 4:23-CV-00945]

Honorable Stephen R. Bough

**DEFENDANT HANNA HOLDINGS, INC.’S UPDATED MOTION TO TRANSFER**

Pursuant to 28 U.S.C. § 1404(a) and this Court’s order “encourag[ing]” Hanna Holdings, Inc. “to file an updated Motion to Transfer,” *see* Dkt. 695, Hanna Holdings respectfully moves for the Court to transfer the claim against Hanna Holdings to the United States District Court for the Western District of Pennsylvania. In support, Hanna Holdings relies on the Suggestions submitted alongside this motion and the Declaration of Tracy Rossetti Delvaux submitted with the Suggestions.

Dated: March 27, 2025

Robert Adams (MO #34612)  
Michael S. Cargnel (MO #52631)  
Hannah M. Smith (MO #73949)  
SHOOK, HARDY & BACON LLP  
2555 Grand Blvd.  
Kansas City, MO 64108  
(816) 559-2101  
rtadams@shb.com  
mcargnel@shb.com  
hsmith@shb.com

John Brumberg (*pro hac vice* forthcoming)  
William Pietragallo II (*pro hac vice* forthcoming)  
Quintin DiLucente (*pro hac vice* forthcoming)  
PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
One Oxford Centre, 38th Fl.  
Pittsburgh, PA 15219  
(412) 263-1836  
JRB@Pietragallo.com  
WP@Pietragallo.com  
QD@Pietragallo.com

Respectfully submitted,

/s/ David Z. Gringer  
David Z. Gringer (*pro hac vice*)  
Emily Barnet (*pro hac vice*)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
(212) 230-8800  
david.gringer@wilmerhale.com  
emily.barnet@wilmerhale.com

Seth P. Waxman (*pro hac vice*)  
Claire Bergeron (*pro hac vice*)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
(202) 663-6000  
seth.waxman@wilmerhale.com  
karin.dryhurst@wilmerhale.com  
claire.bergeron@wilmerhale.com

*Attorneys for Defendant Hanna Holdings, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on March 27, 2025, this document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ David Z. Gringer

David Z. Gringer

*Attorney for Hanna Holdings, Inc.*